

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, ) (18 U.S.C. § 371)  
 ) (18 U.S.C. § 472)  
v. ) (18 U.S.C. § 982)  
 )  
(1) COREY TERRELL BARNES, )  
a/k/a Cashmir Jackson, )  
a/k/a Crumb, )  
 )  
(2) ROCHELLE LYNN ROEN, and )  
 )  
(3) MARKEETA WESLEY, )  
 )  
Defendants. )

INDICTMENT *CR 10-268 PJS/JJK*

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

At all times relevant to this Indictment:

1. Defendants COREY TERRELL BARNES, ROCHELLE LYNN ROEN, and MARKEETA WESLEY were residents of the State and District of Minnesota.

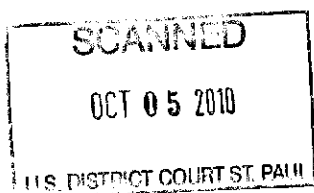
2. Target is a national retailer based in Minneapolis, Minnesota, with stores located in the State and District of Minnesota and elsewhere.

COUNT 1

(18 U.S.C. § 371)

(Conspiracy to Pass Counterfeit Obligations)

3. Beginning on or before January 1, 2009, and continuing until on or about July 31, 2010, in the State and District of Minnesota and elsewhere, the defendants,



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COREY TERRELL BARNES,  
a/k/a Cashmir Jackson,  
a/k/a Crumb,  
ROCHELLE LYNN ROEN, and  
MARKEETA WESLEY,

and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and with intent to defraud pass, utter, sell, and publish falsely made, forged, counterfeited and altered obligations of the United States, in violation of Title 18, United States Code, Section 472, all in violation of Title 18 United States Code, Section 371.

PURPOSE OF THE CONSPIRACY

4. The purpose of the conspiracy was to obtain money, merchandise, and other things of value from Target and other retailers and commercial businesses located in the State and District of Minnesota and elsewhere.

MANNER AND MEANS OF THE CONSPIRACY

The object of the conspiracy was to be accomplished in substance as follows:

5. As a part of the conspiracy, defendant COREY TERRELL BARNES would falsely make, forge, counterfeit, and alter obligations of the United States, specifically, United States currency.

6. As a further part of the conspiracy, defendant COREY

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TERRELL BARNES would provide the falsely made, forged, counterfeited, and altered United States currency to defendants ROCHELLE LYNN ROEN and MARKEETA WESLEY.

7. As a further part of the conspiracy, defendants COREY TERRELL BARNES, ROCHELLE LYNN ROEN, and MARKEETA WESLEY would pass, utter, sell, and publish the falsely made, forged, counterfeited, and altered United States currency at retailers located in the State and District of Minnesota and elsewhere, in order to purchase merchandise or other things of value from said retailers.

8. As a further part of the conspiracy, defendants COREY TERRELL BARNES, ROCHELLE LYNN ROEN, and MARKEETA WESLEY would return the merchandise or other things of value previously purchased from the retailer in exchange for genuine United States currency.

9. As a further part of the conspiracy, defendants COREY TERRELL BARNES, ROCHELLE LYNN ROEN, and MARKEETA WESLEY, would share the genuine United States currency obtained from the retailers as a result of the scheme to defraud.

#### OVERT ACTS

10. In furtherance of the conspiracy and to accomplish the object of the conspiracy, defendants COREY TERRELL BARNES ("BARNES"), ROCHELLE LYNN ROEN ("ROEN"), and MARKEETA WESLEY ("WESLEY"), knowingly committed various overt acts within the State

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and District of Minnesota, including but not limited to the following:

**Manufacture of Counterfeit United States Currency**

a. On or before November 3, 2009, defendant BARNES falsely made, forged, counterfeited, and altered United States currency.

**Purchases Using Counterfeit United States Currency**

b. On or about November 3, 2009, defendant BARNES, with intent to defraud, did pass and utter to Target Store T1832, located in Blaine, Minnesota, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denominations of twenty dollars, fifty dollars, and one hundred dollars to purchase several items of merchandise.

c. On or about November 3, 2009, defendant ROEN, with intent to defraud, did pass and utter to Target Store T1095, located in Minneapolis, Minnesota, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denominations of fifty dollars, and one hundred dollars to purchase at least one item of merchandise.

d. On or about November 3, 2009, defendant WESLEY, with intent to defraud, did pass and utter to Target Store T1095, located in Minneapolis, Minnesota, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in

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the denomination of one hundred dollars to purchase at least one item of merchandise.

e. On or about July 9, 2010, defendant BARNES, with intent to defraud, did pass and utter to Target Store T0619, located in Shoreview, Minnesota, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denomination of fifty dollars, to purchase at least one item of merchandise.

f. On or about July 23, 2010, defendant WESLEY, with intent to defraud, did pass and utter to Target Store T2456, located in Otsego, Minnesota, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denominations of twenty dollars and fifty dollars, to purchase at least one item of merchandise.

g. On or about July 23, 2010, defendant WESLEY, with intent to defraud, did pass and utter to Target Store T2193, located in Maple Grove, Minnesota, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denominations of ten dollars, twenty dollars and one hundred dollars, to purchase at least one item of merchandise.

**COUNT 2 - 5**

(18 U.S.C. § 472)

(Passing Counterfeit Obligations)

11. On or about November 3, 2009, in the State and District of

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**COREY TERRELL BARNES,**  
a/k/a Cashmir Jackson,  
a/k/a Crumb,  
**ROCHELLE LYNN ROEN, and**  
**MARKEETA WESLEY,**

with intent to defraud, did pass, utter, and publish to the Target Stores identified below, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denominations and serial numbers as set forth below, which the defendants then knew to be falsely made, forged and counterfeited:

COUNT	DEFENDANT	LOCATION	TARGET STORE	NOTE	SERIAL NUMBER
2	BARNES	Blaine	T1832	\$50	IL23708266A
3	BARNES	Blaine	T1832	\$100	AK04845146A
4	ROEN	Minneapolis	T1095	\$50	IL23708266A
5	WESLEY	Minneapolis	T1095	\$100	AK04845146A

All in violation of Title 18, United States Code, Section 472.

A TRUE BILL

\_\_\_\_\_  
UNITED STATES ATTORNEY

\_\_\_\_\_  
FOREPERSON